

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: **Gregory Freeman** : CHAPTER: 13  
:   
:   
DEBTOR : BANKRUPTCY NO.: **18-12236MDC**

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

**Debtor** has filed Motion to Appoint Special Counsel

1. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).
2. **If you do not want the court to grant the relief sought in the Motion** or if you want the court to consider your views on the Motion, then on or before **October 5, 2021** **you or your attorney must file a response to the Motion.** (*see instructions on the next page*).
3. **A hearing on the Motion is scheduled to be held on October 12, 2021 at 10:00 AM in Courtroom #4, United States Bankruptcy Court, United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107-4228.** Unless the court orders otherwise, the hearing on this contested matter will be an **evidentiary hearing.**
4. **If you do not file a response to the Motion,** the court may cancel the hearing and enter an order granting the relief requested in the Motion.
5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed a response.
6. If a copy of the motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

**Filing Instructions**

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1**, you must file your response electronically.

8. **If you are not required to file electronically**, you must file your response at

Bankruptcy Clerk's Office  
900 Market Street  
Philadelphia, PA 19107-4228

9. **If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.

10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

**Michael D. Sayles, Esquire  
Sayles & Associates  
427 West Cheltenham Avenue,  
Suite #2  
Elkins Park, PA 19027  
Phone No.: 215 635 2270  
e-mail: midusa1@comcast.net**

Date: **September 6, 2021**